IIL REMARKS

Claims 1-9 are pending in this application. Reconsideration in view of the following remarks is respectfully requested.

Applicants do not acquiesce in the correctness of the rejections or objections and reserve the right to present specific arguments regarding any rejected or objected-to claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

In the Office Action, claims 1-9 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,134,550 to Van Oorschot *et al.* This rejection is respectfully traversed. Applicants assert that the Office has misinterpreted one or both of Van Oorschot *et al.* and the present application.

In rejecting claim 1, the Office alleges that Van Oorschot *et al.* teach "identifying a certificate authority filter by referring to a table, that comprises identification of at least one certificate authority filter." Office Action at 2. This rejection is respectfully traversed.

In support of the rejection, the Office cites column 4, lines 52-62 of Van Oorschot *et al.*, which read (emphasis added):

> For example, where a high degree of compilation is performed, the certificate chain data may be a list of all certification authorities in a shortest trusted path starting with a subscriber's own CA and ending with the target CA that issued the certificate of the subscriber that sent a digitally signed message. The compiled certification authority trust data serves as certificate chain data that may be for example, a table of trust relationships among the certificate issuing units in a community of interest, to facilitate rapid validity determination of the certificate by a plurality of requesting units.

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Thus, the table disclosed by Van Oorschot *et al.* is a table of relationships among certification authorities. This interpretation is supported by column 2, lines 22-26 of Van Oorschot *et al.*, which read:

> Certificate chains correspond to directed trust paths, also known as certification paths, such as trust relationships among certification authorities where at least one certification authority (CA) has certified another certification authority.

On page 5 of the Office Action, the Office states that "examiner considers certificate chain data as applicant's table." First, Applicants assert that Van Oorschot *et al.* do not teach a table comprising a certificate authority filter. As used in the present application, a certificate authority filter is defined as "mainly a central repository comprising a list of trusted CAs with their associated Certificates." Application at 18, lines 5-6. As shown above, the tables of Van Oorschot *et al.* contain only information regarding prior cross-certifications among a plurality of CAs and do not contain certificates themselves or a certificate authority filter.

Second, Applicants respectfully assert that the certificate chain data of Van Oorschot *et al.* is both functionally and structurally different from both the CAF table and the CFC table of the present invention. As is clear from the language of claim 1, the claimed table may contain as few as one certificate authority filter. As such, there are no relationships among the certificate authority filters in these tables. That is, the tables of the present invention contain no "trust paths" and no relationships among certificate authority filters, since the present invention does not require certification of one certification authority by another certification authority, as in the Van Oorschot *et al.* method. Accordingly, for each of the reasons above, Applicants assert that Van Oorschot *et al.* do not anticipate claim 1 and respectfully request withdrawal of the rejection.

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In rejecting claim 2, the Office alleges that Van Oorschot *et al.* teach "discarding the certificate if the response indicates that the certificate authority that has issued the certificate is not a trusted certificate authority." Office Action at 3. This rejection is respectfully traversed.

In support of its rejection, the Office cites column 8, lines 13-22 of Van Oorschot *et al.*, which read:

> Similarly, where certificate revocation data, such as CRL's and ARL's are included in the database 302, the certificate chain data generator 400 obtains the certificate revocation data and generates the certificate chain data consistent with the revocation data. For example, a CA may be excluded from a trust path because a cross-certificate for the CA has been revoked. Hence a trusted path link that has been severed because of a revoked certificate is reflected as a modification in trust links among the community of interest.

Applicants respectfully assert that the Office has misinterpreted the cited passage of Van Oorschot *et al.*, which makes no mention of discarding a certificate. Rather, the passage describes a modification to certificate chain data to reflect the fact that a "trusted path link" can no longer be trusted. As described above, the certificate chain data of Van Oorschot *et al.* does not contain certificates themselves, so such modification cannot result in the discarding of a certificate. Applicants assert, therefore, that Van Oorschot *et al.* do not anticipate claim 2 and respectfully request withdrawal of the rejection.

In rejecting claim 7, the Office alleges that Van Oorschot *et al.* teach "finding in a table the certificate authority, the table comprising: identification of at least one certificate authority and a level of trust and a public key associated with each of said at least one certificate." Office Action at 5. As noted above, the Office states that "examiner considers certificate chain data as applicant's table." *Id.* This rejection is respectfully traversed.

In support of the rejection, the Office cites column 5, lines 4-13, which read:

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Moreover, a certificate chain data constructing unit can provide the certificates of the corresponding certification authorities in a constructed chain directly to a requesting unit. Alternatively, the certificate chain data constructing unit can provide names or directory information or other identification data of those certification authorities in a selected path between a beginning and target certification authority, for example the target CA being the CA which issued the certificate of a subscriber whose public key certificate is to be verified.

Applicants assert that neither the cited passage nor any other portion of Van Oorschot *et al.* teaches a table comprising a public key. Rather, as can be seen most clearly in FIGS. 7a and 7b of Van Oorschot *et al.*, the tables of Van Oorschot *et al.* are cross-reference tables depicting trust paths among a plurality of certificate authorities (CAs). These tables do not contain certificates themselves or public keys associated with certificates. Rather, they contain only information regarding prior cross-certifications among the plurality of CAs. Accordingly, Applicants assert that Van Oorschot *et al.* do not anticipate claim 7 and respectfully request withdrawal of the rejection.

In view of the foregoing, Applicants respectfully requests withdrawal of the rejection, and allowance of the application. Should the Examiner require anything further from Applicants, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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